

COVID-19 PANDEMIC AND HUMAN RIGHTS IN INDIA: A STUDY

*Amardeep**

ABSTRACT

The World Health Organization (WHO) announced a worldwide pandemic on March 11, 2020. It had asked countries to take immediate measures to curb the virus's transmission, stressing "alarming levels of spread and severity." While the virus had disturbed countless lives, there is little doubt that the people and groups who have been most devastated by the virus are those who were already disadvantaged prior to the outbreak. The global epidemic had a negative impact on many human rights and their preservation. Human rights have long been regarded as critical to a person's complete growth as well as progression generally. Human rights are pertained to a Person's life, liberty, equality, and dignity. Various Human Rights such as Right to freedom of speech and expression, Right to Decent Burial, Right to Education etc. were impacted due to worldwide health emergency. So apart from heavy causalities it becomes also relevant to study the covid 19 Pandemic in light of human rights violations that happened during the counter-pandemic measures implementation such as curfews and strict lockdown.

Keywords: Covid 19 and Human Rights, Freedom of Speech and Expression and Covid 19, Right to Education During Pandemic , Right to Health in India , Human Rights During Lockdown

* LLM (Criminal Law) Student at Rajiv Gandhi National Institute of Law, Patiala, India

INTRODUCTION

The World Health Organization (WHO) announced a worldwide pandemic on March 11, 2020. It had asked countries to take immediate measures to curb the virus's transmission, stressing “alarming levels of spread and severity.” The magnitude and seriousness of the COVID-19 virus certainly raised to the level of a global health emergency, justifying limits on some rights, such as those resulting from isolation and mandatory quarantine's rules restricting freedom of movement. As of April 2022, 522,062 lives are already taken by the coronavirus in India and many countries including India are again heading toward the 4th wave of pandemic with cases continue to raise and states started to bring back the mandatory mask and sanitizer guidelines for people.¹

While the virus had disturbed countless lives, there is little doubt that the people and groups who have been most devastated by the virus are those who were already disadvantaged prior to the outbreak. Pre-existing systemic imbalances have been amplified and made obvious by the outbreak. The outbreak, like earlier emergencies, has special regard for gender, caste, race, religion, orientation, or any other societal feature. The pandemic lockdowns impact largely those who were already underprivileged and stigmatized the worst. The global epidemic had a negative impact on many human rights and their preservation. Human rights have long been regarded as critical to a person's complete growth as well as progression generally. Human rights are pertained to a Person's life, liberty, equality, and dignity.

As per United Nations “*Human rights are rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.*”²

Not even a single element of the human rights definition by UN left untouched during Covid pandemic. Whether it be Right to Health, right to life and dignity, right to work and ultimately the right to decent burial all such precious human rights got violated. Criminal charges under draconian laws such as UAPA, NSA and sedition were slapped against citizens who were

¹ World Health Organization , <https://covid19.who.int/region/searo/country/in>

² Human Rights, <https://www.un.org/en/global-issues/human-rights>

complaining against shortage of oxygen cylinders and trying to approach the state governments on social media.³ Which heavily infringed the freedom of speech and expression.

The government's approach to the COVID-19 outbreak was clearly swift but the extent of its execution demonstrates an evident lack of preparation and cooperation. India did not reap the rewards by instituting preventive closure, and within a few weeks, it had entered the list of top coronavirus-affected countries.⁴ Migrant workers were vilified and judged harshly for disease outbreaks. They were, nevertheless, one of the most severely afflicted group. Starvation, suicides, illness, roadway and train mishaps, police violence, and denial of proper medical attention were among the causes of death for migrants.

So apart from heavy casualties it becomes also relevant to study the covid 19 Pandemic in light of human rights violations that happened during the counter-pandemic measures implementation such as curfews and strict lockdown.

RIGHT TO HEALTH

According to the WHO, *“Health is a state of complete physical, mental and social wellbeing and not merely the absence of disease. It is the state legal obligation to ensure uniform access to timely, acceptable, and affordable health care of appropriate quality as well as to provide for the underlying determinants of health, such as safe and potable water, sanitation, food, housing, health-related information and education, and gender equality to all its people.”*⁵

Article 12 of the International Covenant on Economic, Social and Cultural Rights (1966)⁶ has recognized the right to health as a basic human right. It provides that *“The States Parties to the present Covenant recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health.”*

This right is guaranteed in many ways under the Indian Constitution although it is not directly provided in the constitution but is inferred from other rights especially the right to life under article 21.

³ Prashant Srivastava, “Tough CM’ Yogi uses NSA, Gangster Act for Covid crimes but can’t seize property just like that” <https://theprint.in/india/tough-cm-yogi-uses-nsa-gangster-act-for-covid-crimes-but-cant-seize-property-just-like-that/652978/>

⁴ Jha, P.S., How Long Will the Pandemic Last? Rate of Growth of Active Cases Holds Key. <https://thewire.in/health/covid-india-timeline-active-recoveries>

⁵ <https://www.who.int/about/governance/constitution#:~:text=World%20Health%20Assembly%20C2%BB&text=Health%20is%20a%20state%20of,absence%20of%20disease%20or%20infirmity.>

⁶ General Assembly resolution 2200A (XXI)

The DPSP in the Constitution gave a foundation for the right to health. Article 47 provides that *“It Duty of the State to raise the level of nutrition and the standard of living and to improve public health”* Human trafficking and child labor are prohibited under article 23, which implicitly helps to the protection of the Right to Health.

Article 41 provides *“the State shall within the limits of its economic capacity and development, make effective provision for securing the right to work, to education and to public assistance in cases of unemployment, old age, sickness and disablement, and in other cases of undeserved want.”*

Apart from Directive Principles, through judicial interpretations right to health has become an inseparable part of Right to life. The Supreme Court of India has played an essential part in safeguarding the public's health. The SC has frequently stated that the term "life" in Article 21 refers to a dignified life, not only survival or animal existence.⁷

The Supreme Court of India in *Bandhua Mukti Morcha v. Union of India*⁸ held that *“although the Directive Principles of State Policy are not binding obligations but hold only persuasive value, yet they should be duly implemented by the State. The dignity and health fall within the ambit of life and liberty under Article 21”*

So, the right to health has gained status of human right as well as the fundamental right. As a result, it is the government's responsibility to look after the general public's health.

Public health and its implementation are presently vested in states as per schedule 7 of the constitution and the states has to rely on center for funds so as to carry out its duties. Hence a proper coordination between both center and states was required during the covid outbreak but opposite response was observed during pandemic, there was a constant fight between states and center on critical issues of public health. For instance, there was a tussle between center and states on vaccine availability, many states blamed center for shortage of vaccines⁹, The policy of central government on procurement of covid vaccines was biggest disaster, states were made to compete with each other for tenders to global private manufacturers. Ultimately SC had to interfere and Justice Chandrachud while hearing a writ petition on issue sternly observed that *“There is a vital issue. Article 1 of the Constitution says that India, that is Bharat is a, Union of States. When the Constitution says that, then we follow the federal rule. Then Government of India has to procure the vaccines and distribute it. Individual States cannot be*

⁷ Francis Coralie Mullin vs The Administrator, Union Territory of Delhi AIR 1981 746a

⁸ AIR 1984 SC 812,

⁹ Deccan Chronicle, “States blame Centre for shortage of vaccine”

<https://www.deccanchronicle.com/nation/current-affairs/120521/states-blame-centre-for-shortage-of-vaccine.html>

left in a lurch"¹⁰ Ultimately Center had to change its unreasonable policy over vaccine procurement.¹¹

During the second wave of pandemic in 2021 medical infrastructure in the country collapsed completely, while waiting for hospital beds or oxygen, people were dying. Treatment became costlier and private hospitals charged the patients arbitrarily. In Delhi a hospital had charged 19 lakhs for covid treatment which included 11 lakhs for pharmacy items. Despite such a huge overcharged bill, the patient died and family allege negligence.¹² State's reliance on private sector in health services costed people their lives.

The National Human Rights Commission in its advisory titled "*Advisory on Right to Health in Context of Covid 19*"¹³ had noted that covid 19 had adversely impacted the treatment of person suffering from tuberculosis, cancer and other fatal diseases. This advisory had guidelines to be followed by the healthcare sector. it included free access to healthcare facilities, right to information of the patient etc.

Lives are lost from the lack of oxygen, but the state's failure in delivering adequate healthcare at no cost or at a reasonable cost may damage people's trust in the system, which is far more deadly and widespread. Courts have recognized right to health as a fundamental right and the distinguishing feature of fundamental right is that it can be enforced against the state. The non-accessibility to basic healthcare facilities violated the right to health of the citizens.

RIGHT OF A DEAD PERSON TO DECENT BURIAL/CREMATION

The COVID-19 virus has caused not only a healthcare, safety, and financial collapse, but also a religious dilemma in human's last path. The bodies of the deceased Covid-19 patients were dumped and discarded as waste. Even the kin of COVID-19 sufferers avoided the body of such individuals after death for fear of becoming infected. Countless bodies were tossed in the Ganga instead of the proper cremation.¹⁴ Dead bodies were seen being eaten by dogs and birds

¹⁰ <https://www.livelaw.in/top-stories/supreme-court-questions-centres-covid-vaccination-policy-chandrachud-ravindra-bhat-174940?infinitescroll=1>

¹¹ "Before PM Modi changed Covid vaccine policy, a nudge from the Supreme Court" <https://www.hindustantimes.com/india-news/before-pm-modi-changed-covid-vaccine-policy-a-nudge-from-the-supreme-court-101623134442210.html>

¹² Kavaljit Singh, "COVID-19 Killed My Wife. Then Came a 19 Lakh Bill From a Hospital That Didn't Have a CT Scanner." <https://thewire.in/health/covid-19-crisis-delhi-oxygen-dhli-hospital>

¹³ <https://nhrc.nic.in/sites/default/files/NHRC%20Advisory%20on%20Right%20to%20Health%20in%20context%20of%20covid-19.pdf>

¹⁴ "Prayagraj: As Ganga's Water Level Rises, More Dead Bodies Begin to Emerge" <https://thewire.in/rights/prayagraj-ganga-water-level-rise-dead-bodies-covid-19>

on the banks of river.¹⁵ It also indicated “*massive discrepancy between the official Covid-19 death figures and the actual numbers on the ground*”.¹⁶ In India, there is no particular legislation safeguarding the rights of the deceased.

In Chennai a doctor had died due to covid-19 virus, his burial was opposed at two cemeteries, his family was attacked by mob. People feared that that burial of covid positive body will spread the virus.¹⁷ After this incident, Madras High Court took cognizance of the matter on a writ petition¹⁸ and observed that “*The right to life also encompasses the right to a decent burial or cremation. The State is clearly under an obligation to ensure that members of all communities are provided access to burial/ cremation facilities.*”

Again, Bombay High Court in *Pradeep Gandhi v. the State of Maharashtra*¹⁹ Held that “*Right to a decent burial, commensurate with the dignity of the individual, is recognized as a facet of the Right to life guaranteed by Article 21 of the Constitution. There is no reason as to why an individual who dies during this period of crisis because of suspected/confirmed COVID-19 infection would not be entitled to the facilities he/she would have otherwise been entitled to but for the crisis.*”

The Supreme Court in *Parmanand Katara v. Union of India*²⁰ It acknowledged that a person's right to life, fair treatment, and dignity extends to his or her deceased body as well. These rights are taken from Article 21 of the Indian Constitution. Furthermore, the granting of afterlife legal rights confers important moral legitimacy on the deceased in our system of justice. The law also seeks to honor and defend a decedent's intentions and interests.

Further Article 130(1) of the fourth Geneva Convention mandates that “*States should ensure that graves are respected, properly maintained, and marked in such a way that they can always be recognized*”

Taking cognizance of the grave violations of right to decent burial and cremation amid covid, the NHRC had issued the advisory to centre and states governments which included various guidelines which included

¹⁵ Covid: Dogs eat bodies on a riverbank in Uttarakhand , <https://www.telegraphindia.com/india/coronavirus-outbreak-dogs-eat-bodies-on-a-riverbank-in-uttarakhand/cid/1817335>

¹⁶ Geeta Pandey , Covid-19: India's holiest river is swollen with bodies , <https://www.bbc.com/news/world-asia-india-57154564>

¹⁷ “Mob denies burial to Chennai doctor after Covid-19 death, many ask is clapping hands enough” <https://www.indiatoday.in/india/story/chennai-doctor-dies-of-coronavirus-denied-burial-10-points-1669313-2020-04-21>

¹⁸ *Suo Motu* WP No. 7492 of 2020, SCC OnLine Mad 938

¹⁹ 2020 SCC OnLine Bom 662

²⁰ 1989 SCC (4) 286

- *In the event of legal heirs disowning the body and depriving it of a decent burial, the local Government / civic body should ensure proper disposal of the body after due legal procedures like post-mortem etc.*
- *It must be ensured by the State/ Local Government that the condition of crematoriums, burial grounds, electric crematoriums are properly maintained to keep them in effective working conditions.*²¹

The gross violation of right to health has further led to the infringement of right to decent burial.

FREEDOM OF SPEECH AND EXPRESSION

“Dissent is the safety valve of democracy. If you don’t allow these safety valves, it will burst.”
-Justice D.Y. Chandrachud

After the right to health another major and intrinsic human right which was grossly violated during the covid 19 pandemic is free speech. Freedom of speech and expression being a fundamental right granted under article 19 (1) (a) is an enormous, significant, fundamental and immensely contentious premise in the province of democracy. The autonomy granted under the right to expression has been subjected to certain reasonable restrictions with the rationale of maintaining public order. Dissent, discussion and scrutiny are a fundamental aspect and forms fundamental ground in the strengthening of a robust and vibrant democracy.

Human Rights Watch found that *“At least 83 governments worldwide have used the Covid-19 pandemic to justify violating the exercise of free speech and peaceful assembly. Authorities have attacked, detained, prosecuted, and in some cases killed critics, broken up peaceful protests, closed media outlets, and enacted vague laws criminalizing speech that they claim threatens public health. The victims include journalists, activists, healthcare workers, political opposition groups, and others who have criticized government responses to the coronavirus.*
”²²

In march 2020 a doctor had posted pics of doctors wearing Raincoats instead of PPE kits on his social media account and criticized government for lack of necessary medical equipment,

²¹ NHRC, “Advisory for upholding the dignity and protecting the rights of dead.”

<https://nhrc.nic.in/sites/default/files/NHRC%20Advisory%20for%20Upholding%20Dignity%20%26%20Protecting%20the%20Rights%20of%20Dead.pdf>

²² “Covid-19 Triggers Wave of Free Speech Abuse” <https://www.hrw.org/news/2021/02/11/covid-19-triggers-wave-free-speech-abuse>

he was detained by police and charged with spreading communal disharmony, his mobile was seized. He was questioned for 16 hours and was forced by the police to admit and apologize on his social media account that his previously posted pics were mistaken. He was released from detention when he appreciated the state government by sharing a tweet. Later doctor moved the high court of Calcutta for getting back his mobile from police. The HC while ordering the police to return the mobile too doctor remarked that *“Freedom of speech and expression which is granted under Article 19 of the Constitution of India has to be scrupulously upheld by the State. If an expression of opinion brings the government into disrepute, it cannot defend this allegation by intimidation of the person expressing the opinion by subjecting him to prolonged interrogation, threatening arrest seizing his mobile phone and SIM card and so on.”*²³

In various cases even draconian laws like Sedition, UAPA and NSA was used against against the people who criticized the govt’s handling of pandemic. For instance, An Actress was charged under the sedition law allegedly for commenting that *“Lakshadweep had zero cases of COVID-19 Now, it is reporting a daily spike of 100 cases. What the Centre has deployed is a bioweapon. Centre was using the Union Territory’s administrator Praful Khoda Patel as a bio-weapon against residents.”*²⁴

UN Office of the High Commissioner for Human Rights had suggested states for releasing “every person detained without sufficient legal basis, including political prisoners, and those detained for critical, dissenting views”²⁵ But instead of it more arrests were made on charges of making critical remarks against govt’s covid handling policy.

Protests and demonstrations were restricted not only in India but across the world as a result of the virus. Lockdown and quarantine policies placed people packed into their homes. So online expression of dissent was the only source of protest against the government. Which also got curbed due to arbitrary use of criminal laws. Further govt of India had ordered the social media Giants Facebook and Twitter to remove the posts that are critical to the government’s handling of the pandemic.²⁶

²³ Soumashree Sarkar, “Calcutta HC Slams Detention Of Doctor Who Tweeted On Insufficient Protective Gear” <https://thewire.in/rights/coronavirus-doctor-detained-calcutta-hc>

²⁴ “Lakshadweep activist Aisha Sultana moves Kerala HC to quash sedition charges” <https://www.newindianexpress.com/states/kerala/2021/jul/02/lakshadweep-activist-aisha-sultana-moves-kerala-hc-to-quash-sedition-charges-2324429.html>

²⁵ “Political prisoners should be among first released in pandemic response, says UN rights chief” <https://news.un.org/en/story/2020/04/1061002>

²⁶ “Twitter, FB and others remove nearly 100 posts after govt order” <https://timesofindia.indiatimes.com/india/twitter-fb-and-others-remove-nearly-100-posts-after-govt-order/articleshow/82242666.cms>

RIGHT AGAINST TORTURE

One of the tightest lockdown restrictions in the world was enacted in India, and the police force was granted broad authority to implement it. With no training or expertise in dealing with such an unforeseen crisis in a very huge and populous nation as India, the police force has been pushed to be on the front lines of virus control.²⁷ Unfortunately, the implementation of the lockdown regulations had turned a brutal and punishing turn, with policemen exercising unreasonable force to impose the restrictions. In the lack of specified rules or a lockdown strategy, the lockdown was imposed as a law-and-order problem than as a public health care issue.²⁸ On social networks, footage had circulated depicting police officers slapping individuals with batons and sticks. Unreasonable corporal punishments such as squatting for long time, Multiple sit-ups, slapping etc were given by the police to the people who were in violation of lockdown rules.²⁹ Kerala HC took cognizance of the matter and observed that *“exemplary work done by the health authorities and the police personnel in containing the spread of COVID-19, but adds that it cannot turn a blind eye to some of the other material that ..has been published in the print, electronic and social media in the past week, that would point to excesses committed by the police personnel in the course of discharge of their duties”*³⁰ Further in Tamil Nadu dual deaths of father-son happened in police custody, The father and son were arrested for having kept their store open 15 minutes beyond closing time in curfew. they were beaten to death in police custody brutally, the case arose when the world's attention turned to police brutality in the aftermath of the killing of George Floyd by the police in the U.S. It has reignited concerns in India for reforms of the nation's police, which human rights activists have characterized as a subculture of brutality and injustice.³¹

²⁷ Times of India, 'For the homeless, corona is just a cold, the worry is food', 24 March 2020. Available at: <https://timesofindia.indiatimes.com/india/for-the-homeless-corona-is-just-a-cold-the-big-worry-is-food/articleshow/74789023.cms>

²⁸ Commonwealth Human Rights Initiative, "Respecting human rights while enforcing the lockdown", 8 April 2020. Available at: <https://www.humanrightsinitiative.org/publication/chri-releases-guidelines-to-police-on-respecting-human-rights-while-enforcing-the-lockdown>

²⁹ "Coronavirus: Sit-ups, squats, 'murga' punishment, police try new ways to keep people at home" <https://economictimes.indiatimes.com/news/politics-and-nation/coronavirus-sit-ups-squats-murga-punishment-police-try-new-ways-to-keep-people-at-home/articleshow/74811310.cms?from=mdr>

³⁰ "Can't turn a blind eye': Kerala HC takes suo motu cognizance of police excesses" <https://www.thenewsminute.com/article/can-t-turn-blind-eye-kerala-hc-takes-suo-motu-cognizance-police-excesses-121512>

³¹ "Lockdown Deaths in India Ignite Debate on Police Brutality and Custodial Killings" <https://www.news18.com/news/india/lockdown-deaths-in-india-ignite-debate-on-police-brutality-2793615.html>

Right against torture is Implicit in article 21 of the Indian constitution which provides the right to life and through various judicial pronouncements this life is interpreted to mean a life of dignity and respect.

As per the recent study on policing in India “55% people feared police would beat them during lockdown”³² It reflects the public perception of police in India which further deteriorated during the pandemic.

Right Against Torture is One of the most accepted human Right. It is regarded as barbarous and inconsistent with humanity.

Article 3 of the Human Rights Convention (ECHR) mandates that “No one shall be subjected to torture or to inhuman or degrading treatment or punishment.” Similar be it UDHR, ICCPR or humanitarian international law, torture and degrading treatment is strictly prohibited.

Torture by the state authorities infringe the right to life and liberty of a person, it deprives a person of his dignity. As rightly pointed out by Supreme Court in *Kishore Singh V. State of Rajasthan*³³ “Nothing is more cowardly and unconscionable than a person in police custody being beaten up and nothing inflicts deeper wound on our constitutional culture than a state official running berserk regardless of human rights”

So gross violation of right against torture occurred during the covid 19 pandemic in India that magnified the need for police reforms.

RIGHT TO EDUCATION

The COVID outbreak had underlined the challenge of establishing an equilibrium between two conflicting rights: the right to public health and the right to education, both of which are guaranteed in India's Constitution.³⁴ Considerations for healthcare system have, obviously, been at the forefront of governmental policies and planning. Moreover, in addition to the public health disaster, the outbreak had resulted in an education turmoil across the nation. Notwithstanding India's “fundamental right to education”, complete school closures had left students across the nation without opportunities for education since the nationwide lockdown began. As per UNESCO “Indian schools had been closed for the longest duration after

³² Common Cause & Lokniti – Centre for the Study Developing Societies (CSDS), https://www.lokniti.org/media/upload_files/SPIR-2020-2021_Vol%20I_Final_April%2013.pdf

³³ (AIR 1981 SC 625).

³⁴ “While the right to adequate healthcare is considered a fundamental right under Article 21 (Right to life and Personal liberty) of the Indian Constitution, the right to education is expressly included as a right under Article 21-A of the Indian Constitution.”

*Uganda.*³⁵ During the outbreak, India, like other nations, depended on internet for continuous education. Unfortunately, majority school, educators, and children have found it difficult to engage in online classes due to a lack of network technologies.

Researches highlighted that “*only 18.3 percent of children in rural areas enrolled in government schools have accessed video recordings, and 8.1 percent have attended live online classes*”³⁶

As per UNICEF “*Globally, 3 out of 4 students who cannot be reached by the remote learning policies come from rural areas and/or belong to the poorest households.*”³⁷

The outbreak had an influence on institutions of higher learning as well. All colleges and universities were decided to shut by the govt and the Universities Grant Commission. All through this time, such schools have depended on online learning programmes. Students' accessibility to technology at homes, on the other hand, has been unequal, leading to irregular exposure and participation in digital education. Furthermore, studies³⁸ suggested that even student and universities with access to information technology faced additional hurdles. Students especially, suffered with the mental and physical health issues during the pandemic, resulting in low participation with online classes. In order to overcome these problems, the Indian government has incorporated a number of late revisions to its “*National Education Policy 2020 (NEP)*” that emphasise on technological integration in education.

it has primarily been left to the educational institutions to close the gap in education policy. Whereas the emphasis on public health is vital, it has led in an educational imbalance throughout the nation, especially among children from low-income families. India's goals making headway include a coordinated drive for national policy change and increased expenditure in the educational program to ensure that no students are left behind.

CONCLUSION

At last, we can conclude that most of the human rights got affected by the covid 19 pandemic in some or other way. The Human Rights discussed in this study were adversely impacted by

³⁵ “After Uganda, Indian schools shut for longest time: UNESCO”

<https://timesofindia.indiatimes.com/india/after-uganda-indian-schools-shut-for-longest-time-unesco/articleshow/90211031.cms>

³⁶ Mehr Kalra and Shivakumar Jolad, “Regression in Learning: The High Cost of COVID-19 for India Children”, , Observer Research Foundation, available at https://www.orfonline.org/wp-content/uploads/2021/08/ORF_IssueBrief_484_CovidEducation.pdf

³⁷ UNICEF , <https://data.unicef.org/topic/education/covid-19/>

³⁸., Sochea, N., & Bindal,., “Digital resilience in higher education in response to COVID-19 pandemic: Student perceptions from Asia and Australia” (2021) 18(5) Journal of University Teaching & Learning Practice

the pandemic in India, although same impact can be noticed in other countries as well where right to freedom of speech and expression got violated on the name of anti-fake news law³⁹. Pandemic had impact on all aspects of human life from the family life to the professional life. Various other basic right also got affected such as right to work, right to movement, right to peaceful assembly etc. Although it is well acknowledged that it is an arduous task to regulate such a large population in times of crisis but it is necessary that human rights should be safeguarded at all cost.

³⁹ “Rush to pass fake news laws during Covid-19 intensifying global media freedom challenges”
<https://ipi.media/rush-to-pass-fake-news-laws-during-covid-19-intensifying-global-media-freedom-challenges/>